

APPENDIX A

CONSULTATION LETTERS UNDER SECTION 7 OF THE ENDANGERED SPECIES ACT



United States Department of the Interior

FISH AND WILDLIFE SERVICE

3817 Luker Road
Cortland, NY 13045



March 5, 2004

Ms. Pierina Noceti
NEPA Specialist
U.S. Department of Energy
National Energy Technology Laboratory
P.O. Box 10940
Pittsburgh, PA 15236-0940

Dear Ms. Noceti:

This responds to your letter of February 19, 2004, requesting information on the presence of endangered or threatened species in the vicinity of the proposed multi-pollutant control system at the Greenidge Generating Station in the Town of Torrey, Yates County, New York.

Except for occasional transient individuals, no Federally listed or proposed endangered or threatened species under our jurisdiction are known to exist in the project impact area. In addition, no habitat in the project impact area is currently designated or proposed "critical habitat" in accordance with provisions of the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.). Therefore, no further Endangered Species Act coordination or consultation with the U.S. Fish and Wildlife Service (Service) is required. Should project plans change, or if additional information on listed or proposed species or critical habitat becomes available, this determination may be reconsidered. The most recent compilation of Federally listed and proposed endangered and threatened species in New York* is available for your information.

The above comments pertaining to endangered species under our jurisdiction are provided pursuant to the Endangered Species Act. This response does not preclude additional Service comments under other legislation.

For additional information on fish and wildlife resources or State-listed species, we suggest you contact the appropriate New York State Department of Environmental Conservation regional office(s),* and:

New York State Department of Environmental Conservation
New York Natural Heritage Program Information Services
625 Broadway
Albany, NY 12233-4757
(518) 402-8935

Since wetlands may be present, you are advised that National Wetlands Inventory (NWI) maps may or may not be available for the project area. However, while the NWI maps are reasonably

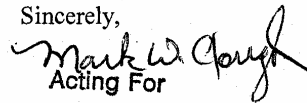
accurate, they should not be used in lieu of field surveys for determining the presence of wetlands or delineating wetland boundaries for Federal regulatory purposes. Copies of specific NWI maps can be obtained from:

Cornell Institute for Resource Information Systems
302 Rice Hall
Cornell University
Ithaca, NY 14853
(607) 255-4864

Work in certain waters of the United States, including wetlands, may require a permit from the U.S. Army Corps of Engineers (Corps). If a permit is required, in reviewing the application pursuant to the Fish and Wildlife Coordination Act, the Service may concur, with or without recommending additional permit conditions, or recommend denial of the permit depending upon potential adverse impacts on fish and wildlife resources associated with project construction or implementation. The need for a Corps permit may be determined by contacting the appropriate Corps office(s).*

If you require additional information or assistance please contact Michael Stoll at (607) 753-9334.

Sincerely,



Acting For

David A. Stilwell
Field Supervisor

*Additional information referred to above may be found on our website at:
<http://nyfo.fws.gov/es/esdesc.htm>.

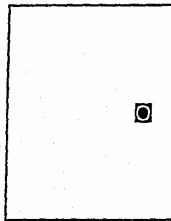
cc: NYSDEC, Avon, NY (Environmental Permits)
NYSDEC, Albany, NY (Natural Heritage Program)
COE, Buffalo, NY

U.S. Fish and Wildlife Service
New York Field Office
3817 Luker Road
Cortland, NY 13045

To provide a timely response to future requests for endangered species comments in New York, please include the following in future inquiries:

1. A concise brief description of the project/action.
2. Name of the hamlet/village/city/town/county where the project/action occurs.
3. The latitude and longitude of the project/action, i.e.: 42° 13' 28" / 76° 56' 30". If the project/action is linear, you may provide coordinates for both ends or just one near center.
4. A map showing the project/action location. Preferably the map should be a U.S. Geological Survey quadrangle map (USGS Quad). You need only provide a copy of that portion where the project/action occurs. Please provide the name(s) of the USGS quadrangle.

If providing only a portion, indicate where the portion would be located on the full quadrangle, i.e.



Providing the information above will assist us in responding to your needs.

If you require additional information please contact Michael Stoll at (607) 753-9334.



U.S. Department of Energy

National Energy Technology Laboratory



February 19, 2004

Chief, Division of Endangered Species
U.S. Fish and Wildlife Service
3817 Luker Road
Cortland, NY 13045

Dear Sir:

The United States Department of Energy (DOE) is considering participation, through a 4.5-year cooperative agreement with CONSOL Energy, Inc., in a project to demonstrate an integrated, multi-pollutant control system on the 104-megawatt, Unit 4 boiler at the AES Greenidge Generating Station near Dresden, NY. Under the cooperative agreement, CONSOL and AES would design, install, operate, and evaluate a multi-pollutant control system for mercury, SO₂, and NO_x, acid gases, and particulate emissions control at the Greenidge Station.

The proposed project would require removal of the existing electrostatic precipitator on Unit 4 and installation of a selective catalytic reduction reactor for NO_x control and a circulating dry scrubber for SO₂, Hg, HCl, HF, and SO₃ control. The proposed control system would be expected to achieve the following control targets:

- NO_x reduction to less than 0.122 lb/million Btu when firing coal or coal-biomass blends
- SO₂ reduction by 95% while the boiler is firing coal with more than 2% sulfur
- Mercury reduction by 90% using activated carbon injection
- Reductions in emissions of other acid gases (HCl, HF, and SO₃) by 95%

A description of the proposed project and graphics depicting its location are provided as Enclosures.

As part of our coordination and consultation responsibilities, and to comply with both Section 7 of the Endangered Species Act of 1973, as amended, and provisions of the Fish & Wildlife Coordination Act, we would appreciate receiving any information you have on wildlife resources, including endangered and threatened species or critical habitat, in the project area.

Based on the scope of the proposed project, DOE plans to prepare an Environmental Assessment (EA), in accordance with requirements of the National Environmental Policy Act, to analyze, document, and disseminate information on the potential environmental consequences of the proposed project. Information that you provide will be incorporated and appropriately addressed in the EA. If your initial review concludes that no endangered or threatened species (or their habitat) are present in the project area, and that neither protected species nor their habitat would be affected by the proposed action, a written acknowledgement of that conclusion would be appreciated. In any case, the information that you provide will be considered in preparing a draft EA, which will be provided for review upon availability.



U.S. Department of Energy

National Energy Technology Laboratory



February 19, 2004

Should you require additional information, please contact me by telephone at 412-386-5428 or by e-mail at 'Pierina.Noceti@netl.doe.gov.'

Sincerely,

A handwritten signature in cursive script that reads "Pierina Noceti".

Pierina Noceti
NEPA Specialist

Enclosures

Description of the Proposed Action

GREENIDGE MULTI-POLLUTANT CONTROL PROJECT

The proposed action is for DOE to provide, through a 4.5-year cooperative agreement with CONSOL Energy, Inc., financial assistance for demonstrating an integrated, Multi-Pollutant Control system on the 104-megawatt, Unit 4 boiler at the AES Greenidge Generating Station near Dresden, NY. Under the cooperative agreement, CONSOL and AES would design, install, operate, and evaluate the multi-pollutant control system for mercury, SO₂, and NO_x, acid gas, and particulate emissions control for application on coal-fired power generation systems.

The Multi-Pollutant Control system would be designed for long-term commercial operation following completion of the cooperative agreement with DOE. The total value of the cooperative agreement would be \$32.8 million; DOE's share would be approximately \$14.5 million.

The Greenidge Multi-Pollutant Control Project will demonstrate the commercial readiness of an emissions control system that, because of its low capital, operating, and maintenance costs, is particularly well suited to meet the emissions reduction requirements of a large group of smaller existing electricity generating units. The multi-pollutant control system offers the potential for low-cost, deep cleaning of air emissions, especially mercury, in support of the President's Clear Skies Initiative. Under the President's Clear Skies Initiative, emissions of SO₂ from power plants would be reduced by 73% from current emissions of 11 million tons annually to a cap of 4.5 million tons annually in 2010 and to 3 million tons annually in 2018. Emissions of NO_x would be reduced by 67% from current a current level of 5 million tons annually to a cap of 2.1 million tons annually in 2008 and to 1.7 million tons annually in 2018. Mercury emissions would be reduced by 69% from current level of 48 tons to a cap of 26 tons in 2010 and 15 tons in 2018. The proposed project addresses the need for mercury emission reduction from coal-fired power plants, which stems from EPA's December 2000 announcement of plans to regulate emissions of mercury from coal-fired power plants. Successful implementation of the proposed technology demonstration would help provide an approach for achieving timely compliance with future mercury regulations.

Unit 4 at the Greenidge Generating Station would be the host facility for the proposed project. AES Greenidge Unit 4 is a tangentially fired, 104-megawatt electricity generator burning bituminous coals with sulfur content ranging from 1.4 to 2.8 percent. Currently, Unit 4 is equipped with only an electrostatic precipitator for emissions control. Unit 4 is considered to be representative of 492 coal-fired electricity generators in the United States with capacities ranging from 50 to 300 megawatts, which collectively represent about 25% of the U.S. coal-fired generating capacity.

The proposed project would require removal of the existing electrostatic precipitator on Unit 4 and installation of a single-bed, in-duct, selective catalytic reduction (SCR) reactor for NO_x control and a circulating dry scrubber (CDS) for SO₂, Hg, HCl, HF, and SO₃ control. The proposed control system would be expected to achieve the following control targets:

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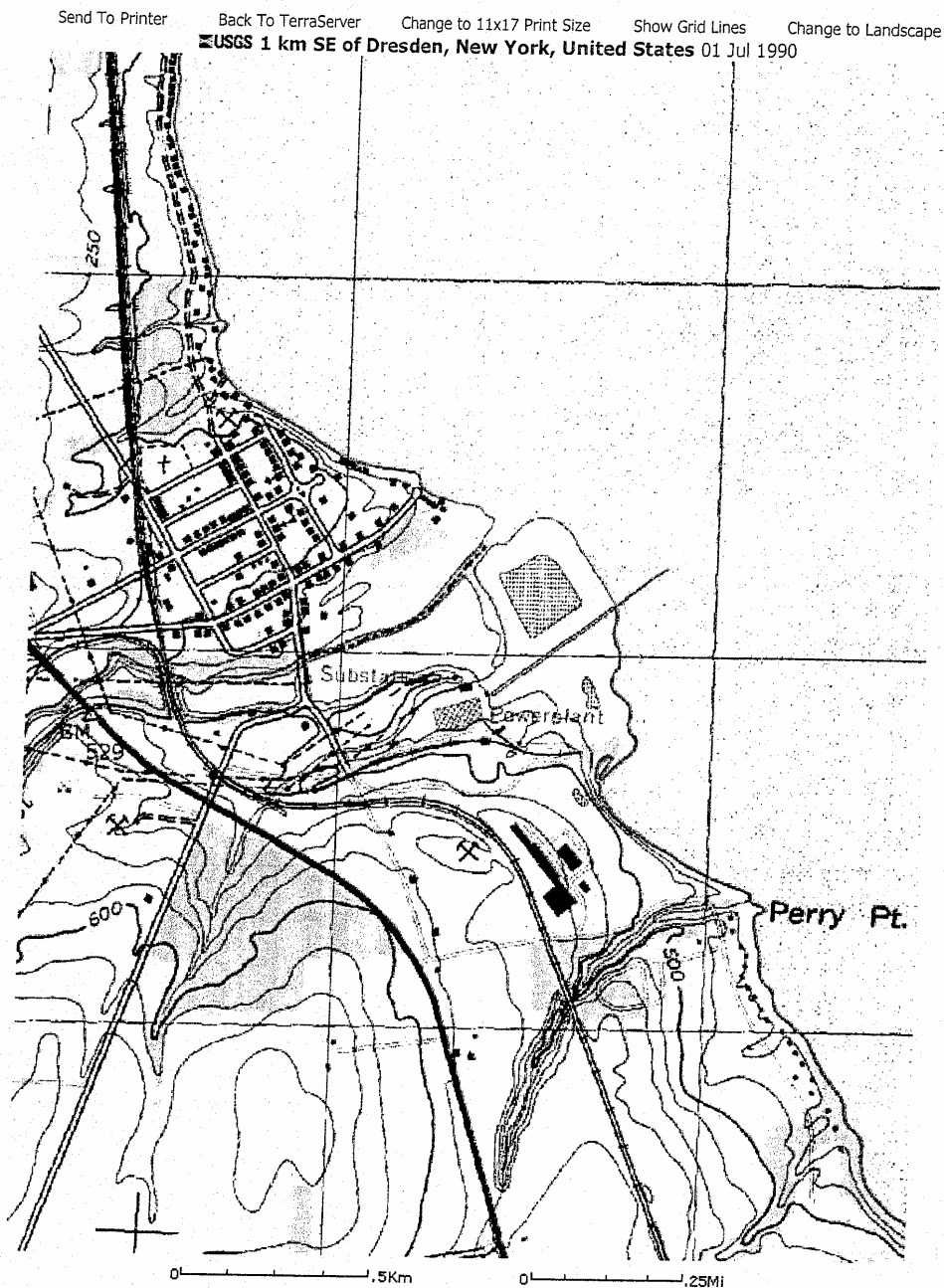
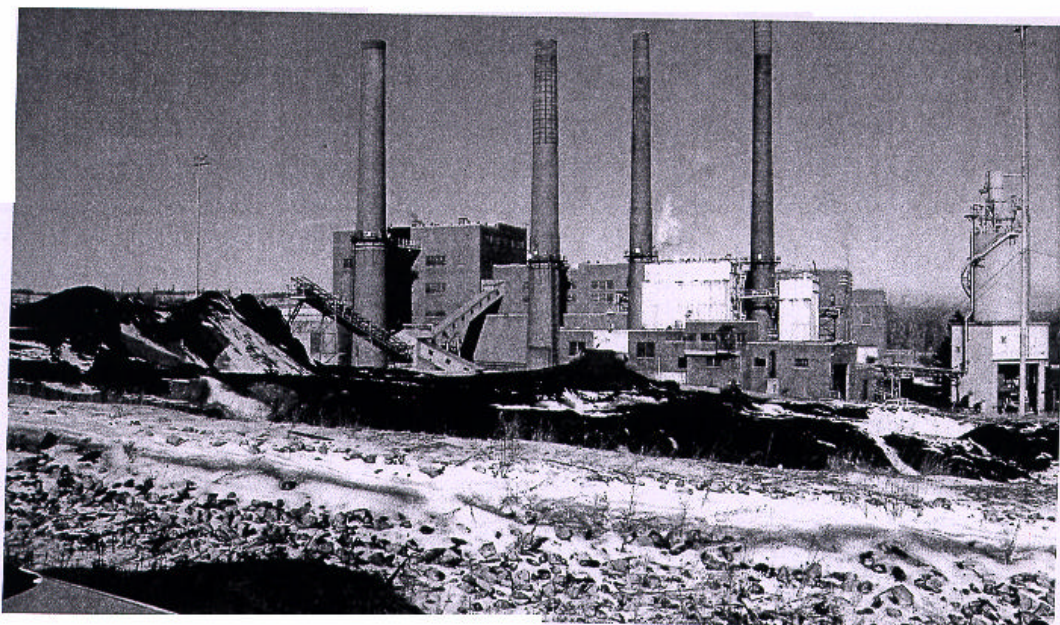
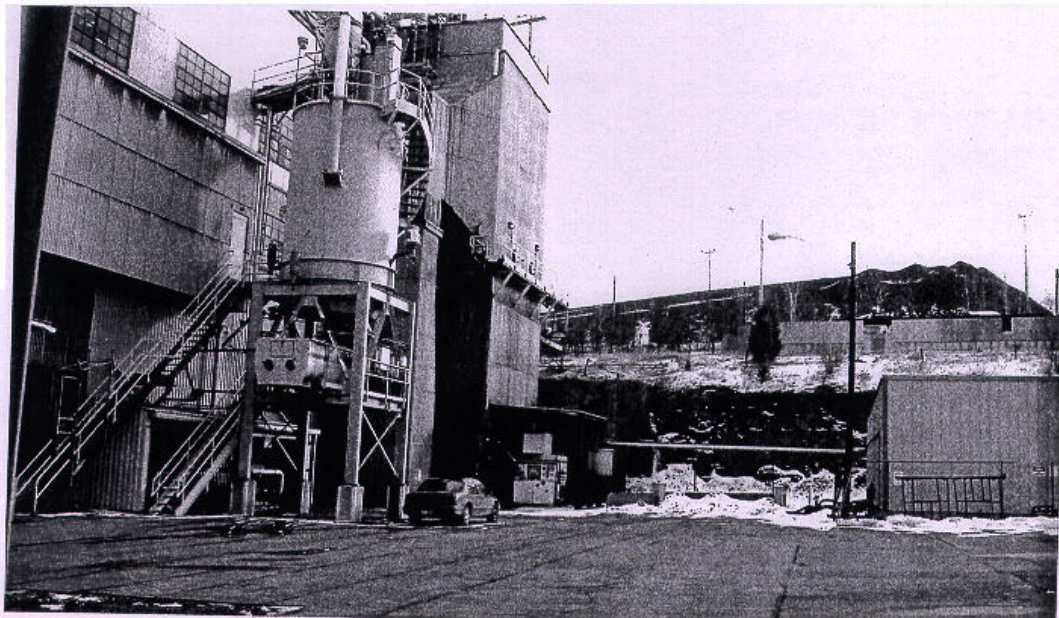


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U.S. Department of Energy

National Energy Technology Laboratory



February 19, 2004

Chief, Division of Endangered Species
U.S. Fish and Wildlife Service
300 Westgate Center Drive
Hadley, MA 01035

Dear Sir:

The United States Department of Energy (DOE) is considering participation, through a 4.5-year cooperative agreement with CONSOL Energy, Inc., in a project to demonstrate an integrated, multi-pollutant control system on the 104-megawatt, Unit 4 boiler at the AES Greenidge Generating Station near Dresden, NY. Under the cooperative agreement, CONSOL and AES would design, install, operate, and evaluate a multi-pollutant control system for mercury, SO₂, and NO_x, acid gases, and particulate emissions control at the Greenidge Station.

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A description of the proposed project and graphics depicting its location are provided as Enclosures.

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U.S. Department of Energy

National Energy Technology Laboratory



February 19, 2004

Should you require additional information, please contact me by telephone at 412-386-5428 or by e-mail at 'Pierina.Noceti@netl.doe.gov.'

Sincerely,

A handwritten signature in black ink that reads "Pierina Noceti". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Pierina Noceti
NEPA Specialist

Enclosures

Description of the Proposed Action

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The Multi-Pollutant Control system would be designed for long-term commercial operation following completion of the cooperative agreement with DOE. The total value of the cooperative agreement would be \$32.8 million; DOE's share would be approximately \$14.5 million.

The Greenidge Multi-Pollutant Control Project will demonstrate the commercial readiness of an emissions control system that, because of its low capital, operating, and maintenance costs, is particularly well suited to meet the emissions reduction requirements of a large group of smaller existing electricity generating units. The multi-pollutant control system offers the potential for low-cost, deep cleaning of air emissions, especially mercury, in support of the President's Clear Skies Initiative. Under the President's Clear Skies Initiative, emissions of SO₂ from power plants would be reduced by 73% from current emissions of 11 million tons annually to a cap of 4.5 million tons annually in 2010 and to 3 million tons annually in 2018. Emissions of NO_x would be reduced by 67% from current a current level of 5 million tons annually to a cap of 2.1 million tons annually in 2008 and to 1.7 million tons annually in 2018. Mercury emissions would be reduced by 69% from current level of 48 tons to a cap of 26 tons in 2010 and 15 tons in 2018. The proposed project addresses the need for mercury emission reduction from coal-fired power plants, which stems from EPA's December 2000 announcement of plans to regulate emissions of mercury from coal-fired power plants. Successful implementation of the proposed technology demonstration would help provide an approach for achieving timely compliance with future mercury regulations.

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USGS 1 km SE of Dresden, New York, United States 01 Jul 1990

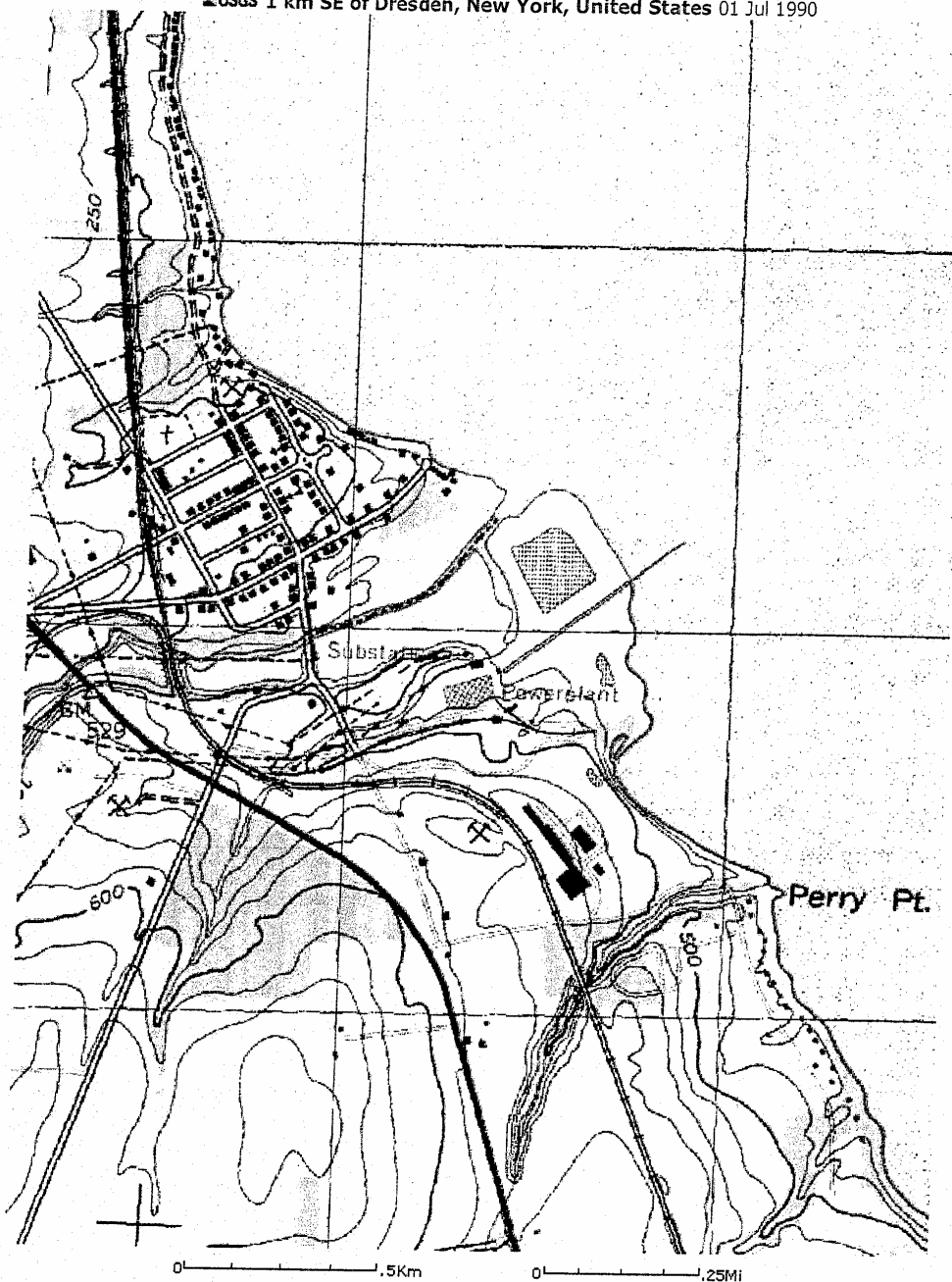
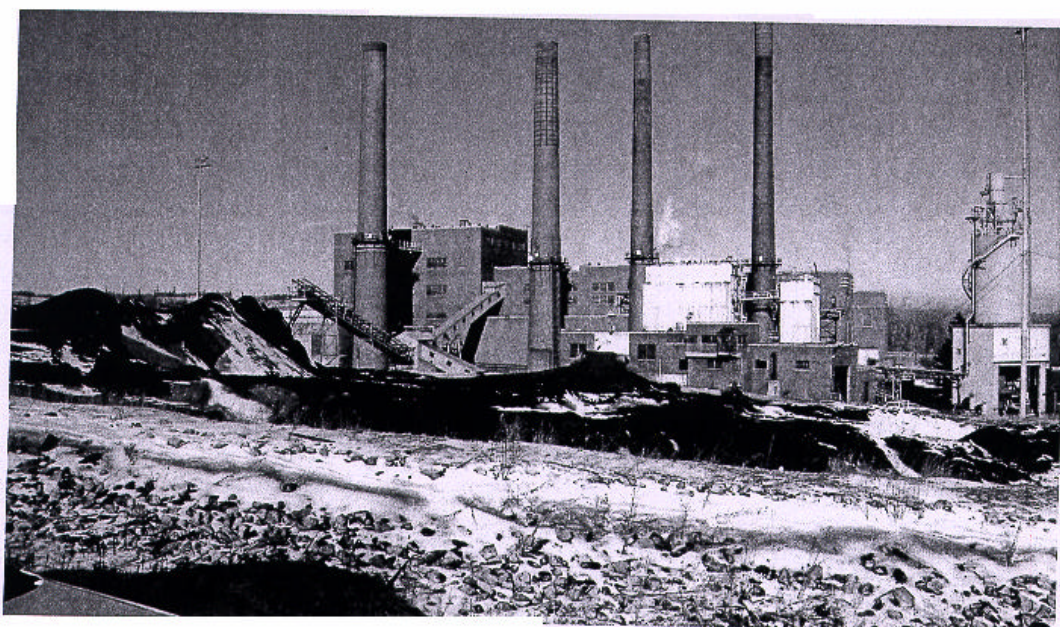
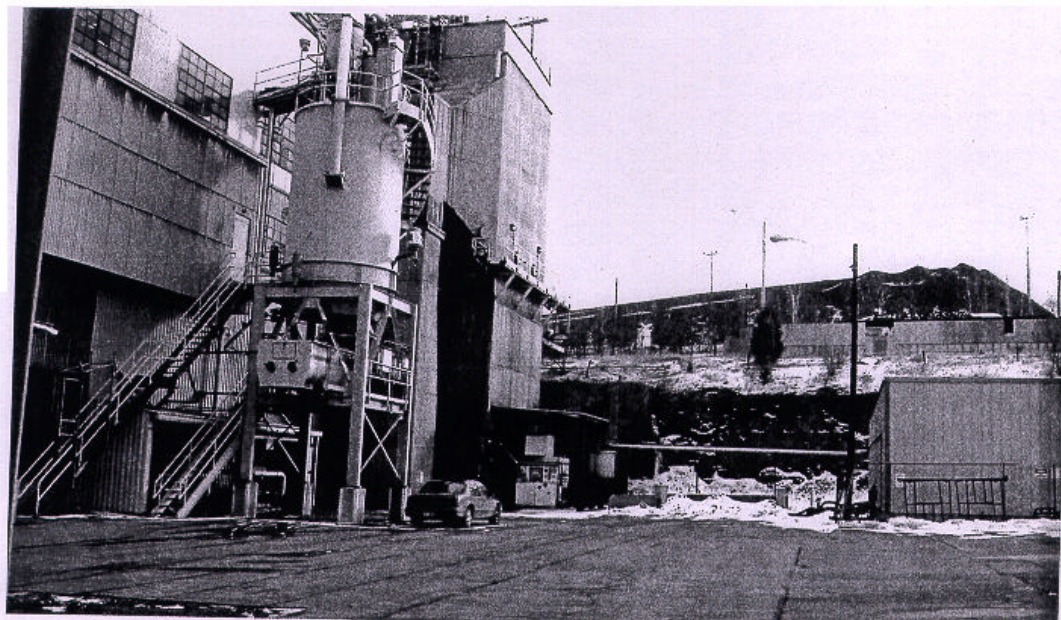


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U.S. Department of Energy

National Energy Technology Laboratory



March 19, 2004

Ms. Jean Pietrusiak
New York State
Department of Environmental Conservation
Information Services
625 Broadway, 5th Floor
Albany, NY 12233-4757

Dear Ms. Pietrusiak:

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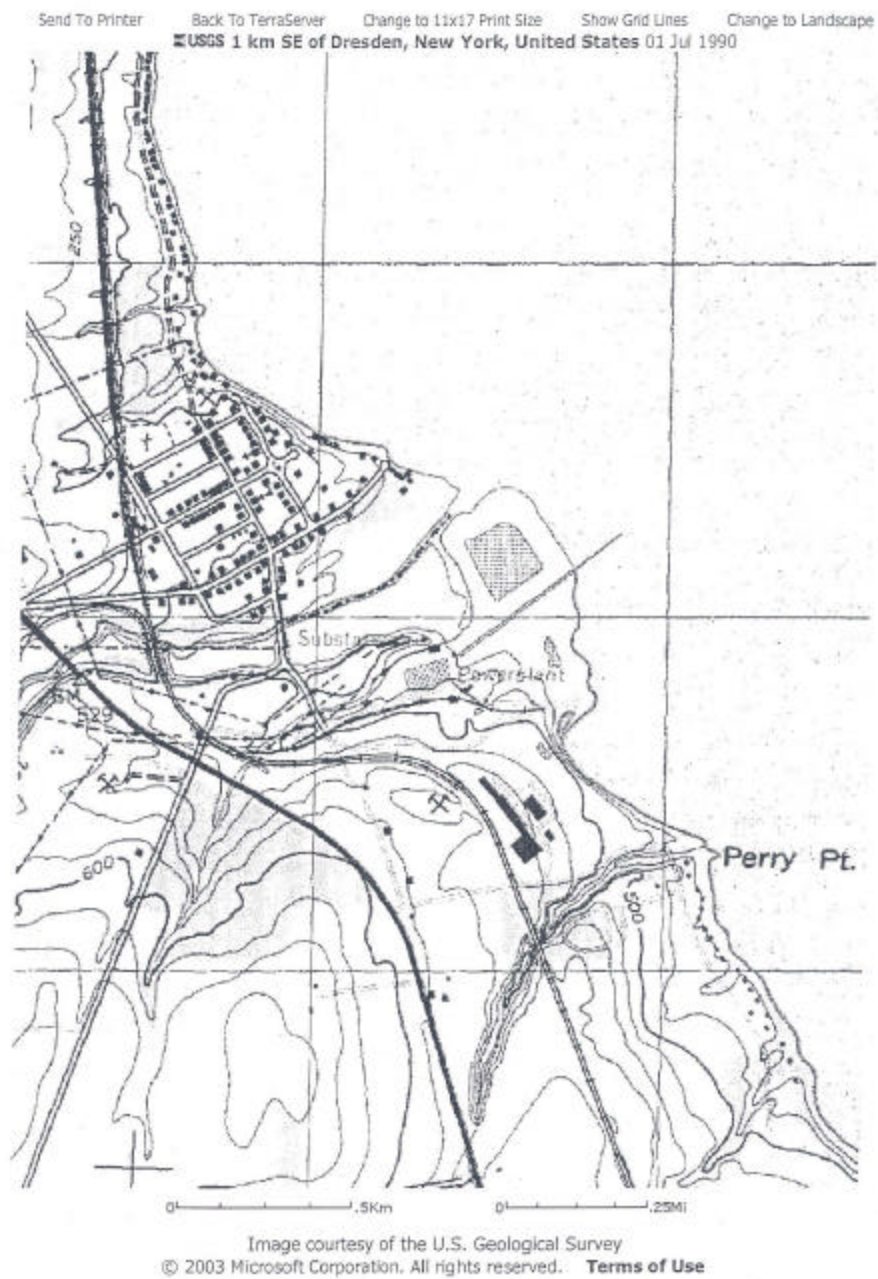
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